

Objective Criteria Review Memo - Investment Equipment LLC

Lynch 1-24 -- Form 2 Application for Permit to Drill (APD) Doc# 401831605

Lynch 1-24 -- Form 4 Sundry to update Location BMPs Doc# 402423083

Approved Form 2A Oil & Gas Location Assessment (Doc# 2587912, approved 9/9/2011)

Location ID# 381266

This memo summarizes COGCC's technical review of the subject well within the context of SB 19-181 and the required Objective Criteria. This location was a historical location created by COGCC using GIS buffers around existing wells in April 2009. An amended Form 2A was approved 9/9/2011. Investment Equipment LLC has since submitted this subject recomplete APD on this approved, built Oil & Gas Location for this currently SHUT IN status well.

For Oil & Gas Locations approved prior to SB 19-181, the Objective Criteria apply to any wells proposed on those approved or existing Oil & Gas Locations. This APD meets the following Objective Criteria:

1. (Criteria 5c) Oil and Gas Locations within: a Sensitive Area for water resources. The location is located within the Northern High Plains Designated Basin.

The following sections provide details regarding the evaluation of each criterion:

Criteria 5c: Oil and Gas Locations within: a Sensitive Area for water resources.

Site Specific Description of Applicability of Criteria 5c: The location is located within the Northern High Plains Designated Basin.

Site Specific Measures to Address Criteria 5c: The Operator provided the following BMPs to mitigate being located within a Designated Basin:

- Location working surface is improved with compacted roadbase with earthen berms (20") around both the tank area (95ft by 45ft rectangle) and the free-water knockout (FWKO) equipment area (20ft by 30ft rectangle) , respectively.
- If the recomplete is successful, the site will be visited daily for inspection by a pumper and weekly by a field foreman. If the recomplete is not successful, the well will be plugged and abandoned.

Summary: Investment Equipment provided BMPs that address possible impacts to being located within the Northern High Plains Designated Basin. The BMPs include: compacted roadbase for the working pad surface, earthen containment berms around the tank and FWKO areas, respectively, and daily inspections if the well is economical, with a plan to P&A the well if production is not economical. Additionally, the most recent COGCC Field Inspection of the location found no actions requiring correction (Doc# 701000763; 5/22/2020).

Director Determination: Based on the Objective Criteria review, the Director has determined that this permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.